

REMARKS

Claims 22 to 44 are presented for examination. Claim 22 is independent. Favorable reconsideration and further examination are respectfully requested.

In the Office Action, sole independent claim 22 was rejected over U.S. Patent No. 5,521,561 (Yrjola) in view of U.S. Patent No. 5,576,920 (Kosuga). We respectfully traverse the rejection.

Amended independent claim 22 is directed to circuitry for use with a mobile telephone. The circuitry comprises a terminal for use with a high-frequency signal, at least two signal lines, a switching unit for connecting the terminal to a signal line, and a primary protection device for protecting against electrostatic discharges. The primary protection device is between the terminal and the switching unit, and the primary protection device comprises a first element that diverts all voltages having a pulse height greater than a 200V switching voltage to a reference potential.

As explained on page 2 of the Office Action:

Yrjölä does not teach a primary protection device for protecting against electrostatic discharges, the primary protection device being between the terminal and the switching unit, the primary protection device comprising a first element that diverts all voltages having a pulse height greater than a 200 V switching voltage to a reference potential.

Kosuga was applied to make up for the foregoing deficiency of Yrjola vis-à-vis claim 22. The Office Action states the following about Kosuga:

Kosuga, in figure 1, teaches a device for receiving an RF signal from an antenna wherein the device is prone to damage caused by surge voltages. The device comprises a primary protection device (5) being between a terminal (R) and a protected receiving device (2), the primary protection device comprising a first element (ZD₁) that diverts all voltages having a pulse height greater than a 200 V switching voltage to a reference potential (column 4 lines 18-25). Kosuga teaches that the primary protection device is set to trigger at 24 volts and thus diverts all voltages over 200 V (column 7 lines 43-45).

It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of Yrjölä with Kosuga, by providing the circuit protection of Kosuga into the device of Yrjölä for the purpose of protecting the RF equipment of Yrjölä without degrading the signal quality (Kosuga column 2 lines 45-61).

We respectfully disagree that it would have been obvious to combine Kosuga with Yrjölä in the manner set forth in the Office Action. Accordingly, we believe that the rejection is improper as a matter of law and, therefore, should be withdrawn.

More specifically, Kosuga describes an electrostatic destruction preventing circuit for protecting a preamplifier at an input stage of a receiving apparatus. That is, Kosuga describes a circuit for use in connection with receiving signals. Furthermore, as explained, e.g., in the following excerpt from column 5, the Kosuga circuit is for use with frequencies that are below frequencies used in mobile telephone applications:

FIG. 3 shows an influence of the transmission interference
Generated in the event that two signals in the VHF band (82
[MHz] and 82.8 [MHz]) are simultaneously applied to the
antenna in the AM receiving apparatus (receiving frequency 55
is 801 [kHz]) for receiving the electric wave in the MW
band. An amplitude modulation of 400 [Hz], 30% is applied
to either one of the VHF signals of 82 [MHz] and 82.8
[MHz]. Further, it is assumed that the output signal level,
when the AM modulation signal of 801 [kHz], 74 [dB μ] is 60
inputted, is 0 [dB] (as indicated by a line 28). With respect
to this, the changes of the noise level of the receiving signal
(801 [kHz]) with respect to the increase of the VHF signal
intensity which is the applied disturbing signal are mea-
sured. 65

Yrjola describes a system for transmitting and receiving signals via a single antenna (A) in a mobile network based on TDMA. This is in contrast to Kosuga, which is for use with a receiving apparatus only. Furthermore, Yrjola is for use with digital transmission (TDMA), not analog transmission like Kosuga. In this regard, the Yrjola circuitry is for use with frequencies on the order of 800 MHz¹ (and, as we understand it, in mobile phone technology this may be on the order of 2GHz), whereas the Kosuga circuitry is for use with signals on the order of 80 MHz (see above). For at least these reasons, it is our belief that one of skill in the art would not have been motivated to combine Kosuga with Yrjola in the manner set forth in the Office Action. We, therefore, respectfully request withdrawal of the rejection of claim 22.

Dependent claims are also believed to define patentable features. Each dependent claim partakes of the novelty of its corresponding independent claim and, as such, each has not been discussed specifically herein.

¹ See, e.g., col. 3, lines 7 to 12

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It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, Applicants respectfully submit that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at the address shown below. All telephone calls should be directed to the undersigned at 617-521-7896.

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Please apply any fees or credits due in this case, which have not already been
covered by check, to Deposit Account 06-1050 referencing Attorney Docket No. 14219-
079US1.

Respectfully submitted,

Date: January 21, 2009



Paul A. Pysher
Reg. No. 40,780

Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110-2804
Telephone: (617) 542-5070
Facsimile: (617) 542-8906

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